

FILED

MAY 29 2015

CLERK, U.S. DISTRICT CLERK  
WESTERN DISTRICT OF TEXAS  
BY [Signature] DEPUTY

Cause No. \_\_\_\_\_

RAYMOND TELLEZ  
Plaintiff(s)

vs.

Defendant

The Geo Group Inc.,  
GEO, and GEO group facility  
Central Detention Facility

In the County Court  
At Law \_\_\_\_\_

**SA 15 CV 0465**

**FB**

Bexar County, Texas

### Statement of Claim

This is Plaintiff's Original Petition filed under the above noted Cause number in the office of the Clerk.

1. This case is a Level three case.
2. Plaintiff(s) resides in Bexar County, The individual hereinafter referred to as Raymond Tellez.
3. Defendant(s) name are: The Geo Group Inc., G.E.O. and GEO group facility Central Detention Facility.
4. Service of Process; Defendant The Geo group Inc. does business in Bexar County, Texas and may be served by serving its registered agent: Mrs. Duque
5. Venue is proper in Bexar County, Texas, because the incident made the basis of this lawsuit occurred all in Bexar County, Texas, this Court has Jurisdiction over the subject matter and or Parties involved in this lawsuit.

6. This is a lawsuit for personal injuries based upon common law negligence. On the date of the incident made the basis of this lawsuit, Defendant breached the duty of reasonable care owed to Plaintiff, Plaintiff was a resident in the facility being managed and or supervised by one or more of the named Defendant's, who's agents were at all times acting in the course and scope of their employment when Plaintiff was savagely attacked due to the negligent supervision of inmates and negligent implementation of security procedures on the date and time of the attack, Defendant's negligence was a proximate cause of the injuries to the Plaintiff.
7. Plaintiff: Raymond Tellez, is seeking \$10 million for actual injuries and an unspecified amount in punitive damages from The GEO. Group Inc. which operates as Federal Central Detention Facility, located at 218 s. Laredo, San Antonio, Texas, 78207
8. On October 24<sup>th</sup>, 2013 in San Antonio, Bexar County, Texas, Plaintiff was stabbed ten times, by another inmate: Roland Contreras and inmate: Randy Gonzales whom assisted Contreras, whom both inmates were assigned to the seventh floor administrative segregation housing unit, where inmates are to be stripsearched and placed in handcuffs with leg irons upon exiting their

assigned Jail Cell, Jail Guard agent Chavarria was working the 7<sup>th</sup> Floor on Date and Time of incident, He was asked To Resign or He would Be fired, He chose To Resign, Inmate Roland Contreras carrying The sharpened steel object arrived in the First Floor Medical Infirmary for Personal Medical Reasons, which is where Plaintiff was assigned To a Jail Cell for His Protection, Jail Guard agent Corona whom was working First Floor Medical Unit on Date and Time of Incident was Instructed By Medical Nurse To Remove Inmates Roland Contreras Handcuffs, The Medical Nurse has NO Authority To Instruct Jail Guard Agents To Remove Handcuffs from Inmates, When Handcuffs are Removed, Jail Guard agents are to observe and Remain with the Inmate at all Times, The Medical Nurse for Being in Violation was Fired and Escorted out of the GEO Federal Detention Facility, There is Only One Entrance to Plaintiff's assigned Housing Unit, On Date and Time of Incident Jail Guard agent Corona Failed To Lock the door, Putting Plaintiff's Life in Great danger, Plaintiff was out of His assigned Jail Cell and Inside The Shower when Plaintiff was Stabbed Ten Times and savagely attacked By Inmates Roland Contreras and Randy Gonzales, It is on Video Monitors showing Both Inmates Entering a Prohibited Area

and Jail Guard agent Corona Failing To lock the door which was to Be locked at all times, The Video of The Monitor is in The Possession of The U.S. Marshals of San Antonio, Bexar County, Texas, Both Inmates Roland Contreras JN. NO. 1622410-1 and Randy Gonzales JN. NO. 1622411-1, Have Been Indicted By The Bexar County Criminal District Attorney, The Plaintiff Refutes That The GEO group Inc. Provides High Quality Services in safe, Secure and Humane Environments, The GEO Federal Detention Facility is Hobbled By Poor Management, Inadequate Training, Lack of Communication and Failed To Follow Protocol, The Fact That Two Inmates Managed To get Passed the 7<sup>th</sup> Floor Jail Guard agents and Enter The First Floor Medical Unit Where Plaintiff Raymond Tellez was assigned To a Jail Cell with a sharpened steel object is Clearly a Negligence on The Part of The GEO Jail Guard agents, Every Jail Guard agent is To be Trained How To Supervise and How To Body Search each Inmate as Part of their Work Policy Procedures, It is about Corporate accountability, It is not Uncommon for Employees To Fabricate Reasons That Justify or attempt to Justify Their Negligent actions or poor Performance The GEO Jail Guard agents Placed Their own self-Interest above The Interests and safety of

Plaintiff RAYMOND Tellez, which violated the Trust and Reliance that Forms the very Core of their Training and Jail Guard duties, They did Anything Other than meet the Standard of Care and Safety, Therefore Breached Protocol By allowing Both Inmates Roland Contreras and Randy Gonzales To Exit their assigned Housing Unit on the 7<sup>th</sup> Floor without First Stripsearching Both Inmates Before Leaving their assigned Jail Cells as Trained To Perform on their Work duties,,

9. Pleading in the alternative Pursuant To Rule 47, 48, Plaintiff makes a Pleading all in the alternative For Medical Expenses, Past and Future, Loss of impairment, associated Physical and Mental Pain and Suffering Past and Future all within the jurisdictional limits of this Court.
10. wherefore premises Considered, Plaintiff Prays that the Defendant(s) Be Cited To appear and answer, and UPON Final Trial, Plaintiff have judgment against defendant For actual and Special damages, Costs of Court, Pre-judgment and Post judgment interest at the highest rate until Paid and For Such Other and Further relief To which Plaintiff MAY be entitled at law or in equity.

Respectfully Submitted;  
Raymond Tellez  
Pro Se Plaintiff

Home address:  
136 Monticello  
SAN Antonio, Tx. 78223